REMARKS

This Application has been carefully reviewed in light of the Office Action mailed September 15, 2006. Claims 1-15, 18-23, and 25-27 are pending in the Application. Applicants respectfully request reconsideration and allowance of all pending claims.

Rejections under 35 U.S.C. § 102 and 35 U.S.C. § 103

Claims 1-6, 8-12, 15, and 18-19 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,502,236 to Allen et al. ("*Allen*"). Claims 7, 14 and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Allen*, in view of U.S. Patent 6,493,868 to DaSilva et al. ("*DaSilva*"). Claim 13 is rejected under 35 U.S.C. § 103(a) as being unpatentable over *Allen*. Applicants respectfully traverse these rejections, for the reasons discussed below.

Claim 1 is directed to a method of converting data that includes dynamically creating at runtime a first optimized conversion routine, and <u>validating specific field conversion options of the conversion routine</u>. The references cited in the Office Action, alone or in combination, do not disclose, teach or suggest each of these limitations.

The Office Action seemingly equates "the compilation of a generated program translation objects by a fast compiler" with the limitation "validating specific field conversion options of the conversion routine". *See Office Action*, page 6. Thus, the Office Action seems to suggest that "the compilation of a generated program translation objects by a fast compiler" explicitly or inherently requires "validating specific field conversion options of the conversion routine". Applicants respectfully disagree.

If the Examiner intends to maintain the rejection of Claim 1 on these grounds, Applicants respectfully request that the Examiner more precisely indicate by citation to *Allen*, where the limitation "validating specific field conversion options of the conversion routine" is disclosed by *Allen*.

Similar to Claim 1, each of amended Claims 8, 15 and 23 include limitations generally directed to validating specific field conversion options of the conversion routine.

Therefore, Applicants respectfully contend that Claims 8, 15 and 23 are each patentably distinguishable from *Allen* for example, for at least those reasons discussed above with regard to Claim 1.

Claims 2-7, 9-14, 18-22 and 25-27 each depend, either directly or indirectly, from Claims 1, 8, 15 or 23. Therefore, Applicants respectfully contend that these claims are each patentably distinguishable from the references cited by the Office Action, for at least those reasons discussed above with regard to their respective base claims. None of the references cited by the Office Action disclose, teach or suggest "validating specific field conversion options of the conversion routine."

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Luke K. Pedersen, Attorney for Applicants, at the Examiner's convenience at (214) 953-6655.
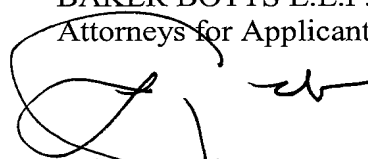
An additional filing fee of $50.00 is due for the addition of a new claim.

Applicants hereby take an extension of time to accompany this RCE for two months from December 15, 2006 to February 15, 2007.

The Commissioner is hereby authorized to charge the $790.00 RCE fee, the $450.00 Extension of Time fee, $50.00 for the addition of a new claim, and to the extent necessary, charge any additional required fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicants

Luke K. Pedersen
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Date: _2/15/07_

CORRESPONDENCE ADDRESS:

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